

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

KENNETH IMES AND MICHELLE IMES : **Chapter 7**
: **Debtors** : **Bankruptcy No: 24-14566**

MOTION FOR RECONSIDERATION

COME NOW, the Debtors', Kenneth and Michelle Imes, by and through their attorney, Joseph T. Bambrick, Jr., who files this Motion to Reconsider to Convert to Chapter 13 and in support thereof, says:

1. The Movant is Kenneth Imes, the Debtor in the above matter.
2. The Debtors filed a case pursuant to 11 U.S.C. § 101, et seq. on or about December 23, 2024.
3. On or about April 15, 2025 the debtors filed a motion to convert their Chapter 7 bankruptcy motion to Chapter 13 bankruptcy motion.
4. On or about April 15, 2025, this court denied the Debtors' motion to convert to Chapter 13.
5. Filing the hearing on April 15, 2025, This Court enter an order denying the debtors' motion to convert to Chapter 13.
6. Since the entry of the court order on April 15, 2025, the Debtors; have been able to obtain two separate "contribution" letters, from two separate individuals who have written that they will contribute and combine fifteen hundredth dollars per month, in order to assist the Debtors' in completing a Chapter 13 plan (see attached the Debtors' exhibits A and B).

7. Because the Debtors' have been able to obtain two contributions letters in the amount of fifteen hundredth dollars the Debtors' believe and therefore he avers that he will be able to successfully complete Chapter 13 plan.

8. The provisions of 11 U.S.C. § 706(a), permitted the Debtors at any time to convert from a Chapter 7 to a Chapter 13 plan.

9. Because of all the above the Debtors; respectfully prays this honorable court to enter an order vacating an order on April 15th, 2025 and to enter an order permitting the Debtors' to convert from a Chapter 7 to Chapter 13 bankruptcy proceeding.

WHEREFORE, for all of the above,

(A) The Debtors' Kenneth and Michelle Imes, respectfully prays this honorable court to vacate its order of April 15, 2025 and to enter an order permitting the debtor's to convert from a chapter 7 plan to a chapter 13 plan.

(B) Grant such other relief as this Court deems fitting and just.

Respectfully submitted by,

Date: April 28th, 2025

/s/Joseph Bambrick
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